

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

BRUCE GREGGS)

Case No.)

19- 722-M)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2018 in the county of Northampton in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1), (b)(1)(C)

possession with intent to distribute a controlled substance

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Special Agent William G. Smith, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/25/19

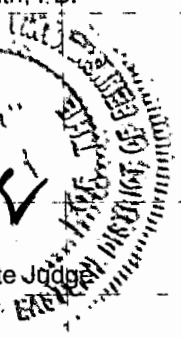


Judge's signature

City and state: Philadelphia, PA

Marilyn Heffley, U.S. Magistrate Judge

Printed name and title



AFFIDAVIT

I, William G. Smith, a Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, deposes and states:

INTRODUCTION

1. I submit this affidavit seeking the issuance of an arrest warrant for, and a criminal complaint charging, BRUCE GREGGS with possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

2. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

3. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), United States Department of Justice ("DOJ"). I have been employed as a Special Agent since June 2002. I am currently assigned to the Allentown Resident Agency of the Philadelphia Division. Prior to joining the FBI, I was employed as a police officer for the Warminster Township Police Department from April 1992 to May 2002. As a Special Agent, I have received instruction and on-the-job training in various aspects of law enforcement. During my employment with the FBI, I have participated in investigations involving bank robberies, financial institution fraud, and crimes against children, among other federal violations. I have participated in numerous investigations involving narcotics trafficking. During the course of those investigations, I have conducted or participated in surveillance, undercover transactions, the execution of search warrants, and debriefings of informants. Through my training, education, and experience, I have become familiar with the manner in which narcotics are trafficked. I have been personally involved in the investigation of this matter.

4. During my law enforcement career, I have participated in cases involving the distribution of narcotics where court-ordered electronic surveillance has been utilized. I have assisted in investigations that involved the monitoring and recording of court-authorized Title III interceptions. I have participated in the arrest of individuals for violations of Federal or Pennsylvania controlled substance laws. I have participated in the execution of search warrants relative to the distribution of controlled substances. I am familiar with how controlled substances are obtained, diluted, packaged, distributed, sold and used within the framework of drug trafficking and how drug traffickers utilize wire communications to facilitate their illegal activities.

5. As a part of my official duties, I investigate criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841(a)(1), 843(b), 846, 848, 853, and 860.

6. Based on my training and experience, I am familiar with the ways in which drug dealers conduct their drug-related business, including, but not limited to their (a) methods of distributing narcotics; (b) methods of distributing drug proceeds; (c) use of telephone communication devices and digital display paging devices; (d) use of numerical codes and code words to identify themselves, the nature of the communication and to conduct their drug-related transactions; and (e) common practice of registering for and obtaining these communication devices under false names, or names of relatives and/or friends to avoid financial responsibilities and tracking of criminal activities by law enforcement entities.

7. This affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for an arrest, I have not included each and every fact known to me concerning this investigation.

I have set forth only the facts that I believe are necessary to establish probable cause to believe that BRUCE GREGGS has committed the crime charged in the criminal complaint.

FACTS ESTABLISHING PROBABLE CAUSE

8. In late 2018, the Federal Bureau of Investigation (FBI) was conducting an investigation into drug trafficking activities in the area of Easton, Pennsylvania, and BRUCE GREGGS was identified as a drug trafficker who bought and sold large quantities of cocaine and/or crack cocaine in Easton. GREGGS is a 55 year-old male who resided at 116 South 12th Street, Easton, Pennsylvania, in November and December 2018. GREGGS has a criminal history that includes, among others, a 1997 arrest and conviction in New York, NY, for drug possession, a 1999 arrest and conviction in New York, NY, for drug trafficking, and a 2002 arrest and conviction for possession of marijuana.

9. On November 30, 2018, the Honorable Lynne A. Sitarski, United States Magistrate Judge, United States District Court, Eastern District of Pennsylvania, issued a search warrant authorizing a search of the residence at 116 South 12th Street, Easton, Pennsylvania, among other residences in Easton, as part of the ongoing federal drug trafficking investigation. On December 1, 2018, at approximately 6:00 am, the FBI and other law enforcement partners executed the search warrant at 116 South 12th Street.

10. The Pennsylvania State Police (PSP) SERT team made entry into 116 South 12th Street and secured all residents. A local arrest warrant was executed on another resident, and evidence was found at the scene which led to the local arrest of GREGGS. GREGGS was found inside his bedroom at the time of the search. Inside the bedroom, law enforcement discovered an open safe containing a large quantity of suspected crack cocaine, approximately \$3,720 in cash, and a health identification card in the name of BRUCE GREGGS. Law enforcement also recovered over \$1,000 in cash and a switchblade knife inside GREGGS' pants pockets. The suspected crack cocaine was sent to the PSP laboratory for chemical testing. The

laboratory test concluded that the suspected crack cocaine weighed approximately 25.1 grams and contained cocaine, a Schedule II substance.


11. Based on my training and experience, the large quantity of drugs found in GREGG's bedroom, along with the thousands of dollars in cash, is consistent with a quantity that would be possessed by a drug trafficker who is selling drugs for cash; it is not consistent with personal use. Therefore, I believe GREGGS intended to distribute these drugs.

12. Because of the sensitive nature of this ongoing investigation, an Order is sought sealing the Criminal Complaint, Affidavit, and Arrest Warrant. The government will request a limited unsealing solely for the purposes of GREGG's initial appearance, probable cause and detention hearings.

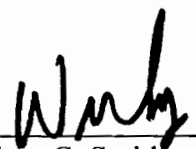
CONCLUSION

13. WHEREFORE, based upon my training and experience and my knowledge of this investigation, I have probable cause to believe, and do so believe, that BRUCE GREGGS committed the crime charged in the criminal complaint.

Sworn to before me this 25TH day of April, 2019



HONORABLE MARILYN HEFFLEY
United States Magistrate Judge



William G. Smith
Special Agent
Federal Bureau of Investigation